

REMARKS

Applicants request favorable reconsideration and withdrawal of the rejections set forth in the above-mentioned Office Action in view of the foregoing amendments and the following remarks.

Claims 1, 3-10, 13, and 14 are now pending, with claims 1, 7, and 8 being independent claims. Claims 1, 3, 7, and 8 have been amended herein. Claims 15 and 16 have been newly added. Support for the amendments and newly added claims can be found throughout the originally-filed disclosure, including, for example, in Figure 1 and at paragraphs 0014 and 0015 of the specification. Thus, Applicants submit the amendments include no new matter.

Claims 1, 3-10 and 13-14 are rejected in the Office Action under 35 U.S.C. § 103(a) as being unpatentable over Lai et al. (U.S. Patent No. 5,706,429) in view of Helland et al. (U.S. Patent No. 5,890,161), Suorsa (U.S. Patent No. 7,124,289), Yu (U.S. Patent No. 5,433,483), Roche (U.S. Patent No. 4,879,557), Vaghi (U.S. Patent No. 6,047,273), and Taylor et al. (U.S. Patent No. 6,256,676).

Applicants respectfully traverse the rejections. Nevertheless, without conceding the propriety of the rejections and solely to expedite prosecution, independent claims 1, 7, and 8 have been amended to clarify the distinctions between the cited references and the claims. Accordingly, Applicants submit that the invention recited in the independent claims is patentably defined over the cited references for at least the following reasons.

Amended independent claim 1 recites a vertically integrated method for facilitating the processing of transactions comprising, inter alia, receiving a request at a host system from an entity for a transaction, and determining, at the host system, software programs for processing the

transaction, with the software programs being selected from a plurality of software programs located on a software solution system configured as a different system from the host system and the entity, the software programs providing processing for different services. Independent claim 1 also recites accessing the software programs via a network to process the transaction. Independent claim 7 recites an apparatus that comprises modules that include features similar to the features recited in independent claim 1. Independent claim 8 recites a method for providing a single source for facilitating the processing of transactions comprising, inter alia, calling, via a network, a plurality of software programs in a solution stack located on a software solution system configured as a different system from the host system and the entity, to process the transactions received from entities.

The Office Action cites Lai et al. as disclosing all the features of the claimed invention “except for specifying a remote processing and particular software services.” In Applicants’ view, which appears to be acknowledged in the Office Action’s admission that Lai et al. does not disclose “remote processing”, the reference does not disclose “programs located on a different system” as recited in the previous claim 1, and, further fails to disclose “programs located on a software solution system configured as a different system from the host system and the entity” as recited in amended claim 1. The Office Action attempts to cure this deficiency by citing Helland et al. as disclosing “an automatic transaction processing of component based server applications” with “Figure 1 show[ing] a group of applications 36 being remotely processed” and a “distributive computer environment... in order to maximize computer efficiency.”

However, Applicants submit that Helland et al. fails to disclose or suggest, a plurality of software programs located on a software solution system configured as a different system from the

host system and the entity, as recited in amended claims 1, 7, and 8. Instead, Helland et al. merely discloses a distributed computing environment as shown in Fig. 1 and 2, with a single server computer 20 (84 in Fig. 2) and remote client computers 49 (92 in Fig. 2). In fact, Helland et al. specifically defines the distributed computing environment:

In a typical installation shown in FIG. 2, the execution environment 80 is on the server computer 84 (which may be an example of the computer 20 described above) that is connected in a distributed computer network comprising a large number of client computers 92 which access the server application components in the execution environment. Alternatively, the execution environment 80 may reside on a single computer and host server application components accessed by client processes also resident on that computer.

Col. 7, lines 23-32 (Emphasis added). Thus, the distributed computing environment is nothing more than a traditional client/server computing model, with a number of client computers accessing a server computer (i.e., the “execution environment”), with either software programs on the server computer or on the client computer processing the transactions. While the Office Action appears to suggest that Helland et al. discloses a more intricate distributed computing environment, this is simply not the case.

Moreover, Helland et al. fails to disclose a software solution system separate from the server computer and the client computer where the software programs are located, where the software programs provide processing for different services. While the Office Action, in pp. 5-6, cites to col. 4, line 62 to col. 5, line 3 of Helland et al. as disclosing “remote processing.” This cited passage reads:

The illustrated embodiment of the invention also is practiced in distributed computing environments where tasks are performed by remote processing devices that are linked through a communications network. But, some embodiments of the invention can be practiced on stand-alone computers.

In a distributed computing environment, program modules may be located in both local and remote memory storage devices.

Col. 4, line 62 to Col. 5, line 3 (Emphasis added). Although the cited passage recites a “communications network” and “both local and remote memory storage devices” as elements of the distributed computing environment, the only communications network disclosed in Fig. 1 of Helland et al. is the network 51, 52 linking the client computer 49 and the server computer 20, and the only remote memory storage device disclosed in Fig. 1 is the memory storage 50 of the remote client computer 49. Thus, Helland et al. clearly defines a distributed computing environment as a standard client/server model and thus fails to disclose or suggest a separate software solution system.

Accordingly, Applicants submit that Lai et al. and Helland et al. fail to disclose or suggest a plurality of software programs located on a software solution system configured as a different system from the host system and the entity, the software programs providing processing for different services, as recited in amended claims 1, 7, and 8.

Applicants further submit the secondary citations to Suorsa, Yu, Roche, Vaghi, and Taylor et al., fail to cure the deficiencies of Lai et al. and Helland et al. with respect to the independent claims of the present application. The Office Action cites Suorsa, Yu, Roche, Vaghi, and Taylor et al. as suggesting specific types of software, as are recited in the dependent claims of the present application. Applicants submit, however, that these references, whether taken individually or collectively, fail to disclose or suggest the recited features in the independent claims of the present application.

For at least the foregoing reasons, Applicants submit the invention recited in independent claims 1, 7, and 8 is patentably defined over the cited references.

The other claims are allowable by virtue of their dependency and in their own right further defining the invention. Individual consideration of the dependent claims is respectfully requested.

Applicants submit that all of the pending claims are allowable over the references of record, and that the application is in condition for allowance. Favorable reconsideration, withdrawal of the rejections, and passage to issue of the present application are earnestly solicited.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our New York office at the address shown below.

Respectfully submitted,

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